

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS**

RICHARD J. ISOLDE, Individually And On  
Behalf Of All Others Similarly Situated,

Plaintiff,

v.

TRINITY INDUSTRIES, INC., TIMOTHY R.  
WALLACE, AND JAMES E. PERRY,

Defendants.

Case No. 3:15-cv-2093

Judge Ed Kinkeade

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING  
THE APPOINTMENT OF LEAD PLAINTIFF AND CO-LEAD COUNSEL**

Lead Plaintiff Movants the Department of the Treasury of the State of New Jersey and its Division of Investment (“New Jersey”); and Plumbers and Pipefitters National Pension Fund and United Association Local Union Officers & Employees Pension Fund (the “Pension Funds”), by and through their undersigned counsel, bring this motion seeking the Court’s approval of this stipulated agreement and Proposed Order.

The undersigned counsel, on behalf of New Jersey and the Pension Funds, hereby stipulate and agree to the following:

1. WHEREAS, on June 29, 2015, pursuant to Section 21D(a)(3)(A) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(A), as amended by the PSLRA, three movants filed motions seeking appointment as Lead Plaintiff in the above-captioned action: (1) New Jersey; (2) the Pension Funds; and (3) City of Austin Police Retirement System (“City of Austin”);
2. WHEREAS, on July 7, 2015, City of Austin withdrew its motion;
3. WHEREAS, the motions of New Jersey and the Pension Funds are the only two motions seeking Lead Plaintiff status pending before the Court;
4. WHEREAS, on March 1, 2016, the Court held a conference on the pending Lead Plaintiff motions;

5. WHEREAS, pursuant to the Court’s directive at the March 1 conference, counsel for New Jersey and the Pension Funds have met and conferred regarding the pending motions;

**NOW THEREFORE, SUBJECT TO THIS COURT’S APPROVAL, NEW JERSEY AND THE PENSION FUNDS STIPULATE AND AGREE AS FOLLOWS:**

1. New Jersey and the Pension Funds agree to work together to represent the Class as Lead Plaintiff of the Class;

2. New Jersey and the Pension Funds agree that New Jersey's chosen counsel, Lowenstein Sandler LLP and Bernstein Litowitz Berger & Grossmann LLP, and the Pension Funds' chosen counsel, Robbins Geller Rudman & Dowd LLP, will serve as Co-Lead Counsel for the Class;

3. New Jersey and the Pension Funds agree that the Kendall Law Group, LLP and Jackson Walker L.L.P will serve as Co-Liaison Counsel for the Class.

DATED: March 3, 2016

Respectfully Submitted,

/s/ Joe Kendall

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*Counsel for the Pension Funds and Proposed Co-Lead Counsel for the Class*

**ACCORDINGLY, IT IS HEREBY ORDERED THAT:**

1. New Jersey and the Pension Funds are **APPOINTED** to serve as Lead Plaintiff pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995, in the above-captioned consolidated action.
2. Lead Plaintiff's choice of Co-Lead Counsel is **APPROVED**, and Lowenstein Sandler LLP, Bernstein Litowitz Berger & Grossmann LLP, and Robbins Geller Rudman & Dowd LLP are **APPOINTED** as Co-Lead Counsel for the Class.
3. Lead Plaintiff's choice of Co-Liaison Counsel is **APPROVED**, and the Kendall Law Group, LLP and Jackson Walker L.L.P. are **APPOINTED** as Co-Liaison Counsel for the Class.

Dated: \_\_\_\_\_, 2016

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HON. ED KINKEADE  
UNITED STATES DISTRICT JUDGE